

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
)
 Advanced Television Systems)
 and Their Impact Upon the) MM Docket No. 87-268
 Existing Television Broadcast Service)

To: The Commission

COMMENTS OF CORDILLERA COMMUNICATIONS, INC.

Cordillera Communications, Inc. ("Cordillera"),^{1/} by its attorneys, submits herewith its Comments on the *ex parte* submissions by the Association for Maximum Service Television, Inc. ("MSTV") and the Association of Local Television Stations, Inc. ("ALTV") in the above-captioned proceeding.^{2/}

I. Introduction.

MSTV and ALTV raise important issues in their respective submissions. MSTV has identified serious problems with adjacent DTV channel allocations; however, its proposed

^{1/} Through wholly-owned subsidiaries, Cordillera owns Television Stations KVOA(TV), Tucson, Arizona; KATC(TV), Lafayette, Louisiana; KOAA(TV), Pueblo, Colorado; KIVI(TV), Nampa, Idaho; KPAX(TV), Missoula, Montana; KRTV(TV), Great Falls, Montana; KTVQ(TV), Billings, Montana; KXLF(TV), Butte, Montana; and KCTZ(TV), Bozeman, Montana.

^{2/} Association for Maximum Service Television, Inc., *Ex Parte Submission Based on New Technical Discoveries To Help the Commission Improve the DTV Table of Allotments/Assignments*, November 20, 1997 ("*MSTV Submission*"); Ex Parte Letter from James B. Hedlund of the Association of Local Television Stations, Inc. to the Honorable William Kennard, Nov. 25, 1997 ("*ALTV Submission*"). In its December 2, 1997 *Public Notice, FCC Seeks Comment on Filings Addressing Digital TV Allotments*, the Commission requested broadcasters' comments on both of these filings.

solution does not alleviate those problems in all instances. These situations must be addressed before any further changes are made to the DTV Table of Allotments. In addition, neither MSTV nor ALTV has taken into account Cordillera's request that the FCC change KOAA(TV)'s DTV channel assignment and transmitter site coordinates. Adoption of Cordillera's request is critical to KOAA(TV)'s ability to provide maximum DTV service to the Pueblo/Colorado Springs market and accordingly must be considered in evaluating MSTV's and ALTV's proposals.

II. MSTV's Allotment Proposal Does Not Resolve All Adjacent Channel Problems.

Cordillera shares MSTV's concern that adjacent DTV channel allotments in certain areas of the country will create significant interference problems. Short-spaced adjacent channel assignments will in many cases impair stations' ability to replicate NTSC coverage. However, as MSTV acknowledges, the improvements to the DTV Table of Allotments it proposes "do not fully solve the . . . problems that are highlighted here and there are other, station-specific problems that this filing does not address." *MSTV Submission* at 10. Indeed, MSTV's improvements do not take into account adjacent channel problems affecting four Cordillera stations in Boise/Nampa, Missoula, Butte and Bozeman. The problem is acute in the Boise/Nampa market where KIVI(TV) and KAID(TV) have been assigned Channels 22 and 21, respectively, and three other stations in the market have been assigned Channels 25, 26 and 27. The MSTV improvements also retain the Commission's adjacent

channel assignments in Missoula, with KPAX(TV) assigned DTV Channel 35 and KTMF(TV) assigned DTV Channel 36. The Butte and Bozeman markets are similarly burdened with the potential for adjacent channel interference with KCTZ(TV) assigned Channel 16 and KXLF(TV) assigned Channel 15.

Moreover, the *MSTV Submission* does not address other factors that have the potential of worsening the effects of adjacent channel interference. For example, there is no way to guarantee that DTV to DTV ratios will be maintained across the propagation path. Receive antennas also could contribute to adjacent channel interference. Adjacent Mexican and Canadian television allotments must be taken into consideration as well. All of these factors need to be studied carefully by the Commission in resolving adjacent channel problems.

The Commission should not adopt MSTV's adjacent channel proposal until all adjacent channel problems have been identified and a workable solution developed to resolve those problems. Given the importance of providing interference-free DTV service, it is essential that any further improvements to the DTV Table of Allotments take into account all instances where adjacent-channel interference may occur.

III. Any Future DTV Allotment Changes Must Reflect the Requested Modifications to the DTV Allotment for KOAA(TV).

Through its wholly-owned subsidiary, Sangre de Cristo Communications, Inc. ("SCC"), Cordillera owns Television Station KOAA(TV), Pueblo, Colorado. In the DTV

Table of Allotments adopted in the *Sixth Report and Order*,^{3/} the Commission assigned DTV Channel 27 to KOAA(TV) and listed the coordinates of the station's current transmitter site as the coordinates for its DTV facilities. On June 13, 1997, SCC filed a Petition for Reconsideration ("Petition") of the FCC's *Sixth Report and Order*, requesting that the coordinates of a transmitter site on Cheyenne Mountain be assigned to KOAA(TV)'s DTV facilities. In its Supplement to Petition for Reconsideration filed on August 22, 1997 ("Supplement"), SCC requested that it be assigned DTV Channel 42 and a transmitter site located on Cheyenne Mountain.

SCC explained in its Petition that the Cheyenne Mountain antenna farm

is the logical choice for KOAA because it would allow the station to maximize its DTV service to the Pueblo and Colorado Springs communities and to compete on an even footing with other television stations licensed to the same market and broadcasting from the same site.

Petition at 2. SCC also demonstrated in its Supplement that the assignment of DTV Channel 42 at the Cheyenne Mountain coordinates would have substantial public interest benefits and would satisfy the FCC's DTV spacing and interference criteria and city grade coverage requirements. Supplement at 2.

Neither the *MSTV Submission* nor the *ALTV Submission* incorporates the DTV channel and transmitter site changes requested by SCC. The public interest, however, would be far

^{3/} *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Report and Order*, 97-115, MM Docket No. 87-268 (Apr. 1997) ("*Sixth Report and Order*").

better served if these changes were incorporated into any further changes to the DTV Table. SCC has shown that Channel 42 can be assigned to KOAA(TV) with a transmitter site located on Cheyenne Mountain in full compliance with applicable technical requirements. SCC also has shown that an expansion of its coverage to include Colorado Springs would allow KOAA(TV) to provide a more effective and competitive signal in the Pueblo/Colorado Springs market, benefitting the viewers in that market. It would be more expedient to make these changes in KOAA(TV)'s allotment now so that the station can implement DTV operations more quickly. Accordingly, consideration of MSTV's and ALTV's proposals must take into account the changes SCC has proposed with respect to KOAA(TV)'s DTV facilities.

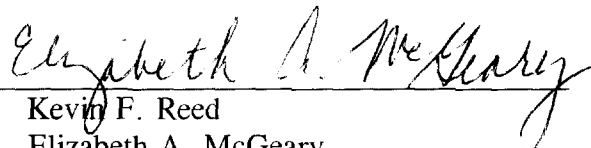
IV. Conclusion.

The *MSTV Submission* and the *ALTV Submission* pose as many questions as they answer. Neither provides a complete resolution of the problems identified, in particular those involving adjacent channel interference. To resolve adjacent channel interference problems, the Commission must address all circumstances where such interference is likely to occur and develop a solution that takes into account all potential sources of interference including those factors that may exacerbate interference levels.

Consideration of MSTV's and ALTV's proposals also must include SCC's request for a change in KOAA(TV)'s DTV channel assignment and transmitter site. Grant of SCC's request will ensure KOAA(TV)'s rapid transition to DTV and enhanced DTV coverage in the Pueblo/Colorado Springs market.

Respectfully submitted,

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